

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

DECLARATION OF SETH A. GOLDBERG

I, Seth A. Goldberg, of full age, hereby declare as follows:

1. I am an attorney at law of the State of New Jersey, a member of good standing of the bar of this Court, a Partner with the law firm of Duane Morris LLP, and counsel to Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Solco Healthcare U.S. (“Solco”), and Huahai U.S. Inc. (“Huahai U.S.”, and collectively with ZHP, Princeton, and Solco, “the ZHP Parties”).

2. I make this Declaration based on personal knowledge and in support of the Memorandum of Law in Support of the ZHP Parties’ Objection to Special Master Order No. 35 Compelling the Production of Documents Prohibited from Production under Chinese Law.

3. Attached to this Declaration as **Exhibit A** is a true and correct copy of a declaration executed by Yang Xueyu, a partner of Yun Zheng Law Firm.

4. Attached to this Declaration as **Exhibit B** is a table listing each document the ZHP Parties have redacted or withheld on the basis of Chinese law.

5. Attached to this Declaration as **Exhibit C** is a true and correct copy of a letter dated March 23, 2021 sent via email from the ZHP Parties' counsel to Plaintiffs' counsel.

6. Attached to this Declaration as **Exhibit D** is a true and correct copy of the final transcript from the March 26, 2021 meet and confer.

7. Attached to this Declaration as **Exhibit E** is a true and correct copy of the final transcript from the March 16, 2021 hearing with the Honorable Thomas I. Vanaskie.

8. Attached to this Declaration as **Exhibit F** is a true and correct copy of Plaintiffs' Third Amended Set of Requests for Production of Documents to All API and Finished-Dose Manufacturing Defendants.

9. Attached to this Declaration as **Exhibit G** is a list of the court-ordered ZHP Party custodians.

Executed on September 8, 2021.

Respectfully submitted,

By: /s/ Seth A. Goldberg

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